

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

BYRON ALEXANDER,
A/K/A "BUNS,"

)
) Criminal No. 16CR 10072
)
) VIOLATIONS:
)
)
) 21 U.S.C. § 841(a)(1) --
) Possession with Intent to
) Distribute and Distribution of
) Cocaine Base
)
) 21 U.S.C. § 860 -- Distribution
) of a Controlled Substance
) Within 1000 Feet of a Public
) Housing Facility
)
) 21 U.S.C. § 853 -- Criminal
) Forfeiture

INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) -- Possession with Intent to
Distribute and Distribution of Cocaine Base)

The Grand Jury charges that:

On or about December 1, 2015, at Boston in the District of
Massachusetts,

BYRON ALEXANDER, A/K/A "BUNS,"

the defendant herein, did knowingly and intentionally possess with
intent to distribute and distribute cocaine base, a Schedule II
controlled substance.

The Grand Jury further alleges that the offense described herein
was committed by the defendant within one thousand feet of the real
property comprising a housing facility owned by a public housing

authority, more particularly, the Lenox Street Housing Development in Boston, Massachusetts, in violation of Title 21, United States Code, Section 860.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury charges that:

On or about December 1, 2015, at Boston in the District of Massachusetts,

BYRON ALEXANDER, A/K/A "BUNS,"

the defendant herein, did knowingly and intentionally possess with intent to distribute cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts 1-2 of this Indictment,

BYRON ALEXANDER, A/K/A "BUNS,"

the defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

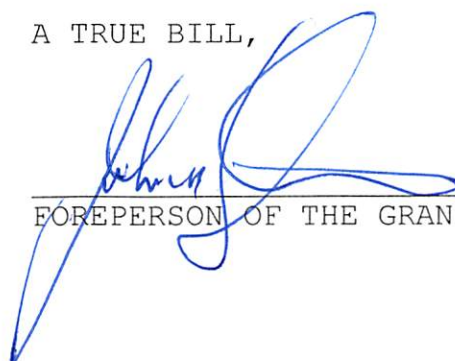
2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

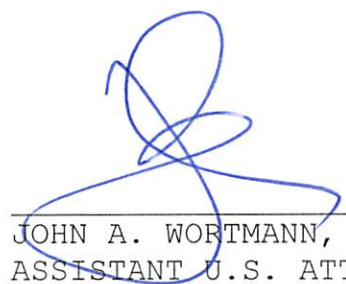
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY



JOHN A. WORTMANN, JR.
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS

March 23, 2016

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk